

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Nashville, Tennessee

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*IN RE: Implementation of the Federal
Communications Commission's Triennial
Review Order (Nine-month Proceeding)
(Switching)*

) *Docket No. 03-00491*

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T.R.A. DOCKET ROOM

**NETWORK TELEPHONE'S RESPONSES TO BELL SOUTH'S
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

Subject to the general and specific objections filed on November 12, 2003, Network Telephone Corporation files the following responses to BellSouth's First Requests for Production. Network Telephone is continuing to determine if other responsive information exists and reserves the right to update and supplement these responses if necessary.

REQUESTS FOR PRODUCTION

1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.

Response: With the exception of the objections noted in the responses to the First Set of Interrogatories, Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

2. Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of Tennessee.

Response: With the exception of the objections noted in the responses to the first set of interrogatories, Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide qualifying service.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

4. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you only provide qualifying service.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

5. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide non-qualifying service.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

6. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

7. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

Response: . Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

8. Provide all documents referring or relating to the classifications used by Network Telephone to offer service to end user customers in Tennessee (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

9. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by Network Telephone, as requested in BellSouth's First Set of Interrogatories, No. 34.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

10. Produce all documents referring or relating to the typical churn for each class or type of end user customers served by Network Telephone, as requested in BellSouth's First Set of Interrogatories, No. 35.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

11. Produce all documents referring or relating to how Network Telephone determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

12. Produce all documents referring or relating to the typical or average number of DS0s at which Network Telephone would choose to serve a particular customer with as DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

13. Produce all documents referring or relating to the cost of capital used by Network Telephone in evaluating whether to offer qualifying service in a particular geographic market.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

14. Produce all documents referring or relating to the time period used by Network Telephone in evaluating whether to offer a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated.)

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

15. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

16. Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

17. Produce all documents referring or relating to any complaints by Network Telephone or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

18. Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to Network Telephone or that Network Telephone believes is superior to BellSouth's batch hot cut process.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

19. Produce all documents referring or relating to an individual hot cut process used by an ILEC in the BellSouth region that is acceptable to Network Telephone or that Network Telephone believes is superior to BellSouth's individual hot cut process.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

20. Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to Network Telephone or that Network Telephone believes is superior to BellSouth's batch hot cut process.

Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

21. Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is acceptable to Network Telephone or the Network Telephone believes is superior to BellSouth's individual hot cut process.

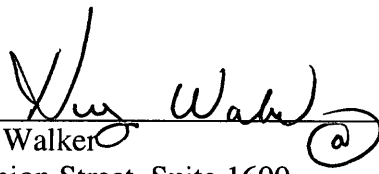
Response: Network Telephone has no documents responsive to this request.

Response provided by Margaret Ring.

This the 4th day of December, 2003

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2003, a copy of the foregoing document was serviced on the parties of record, via US mail:

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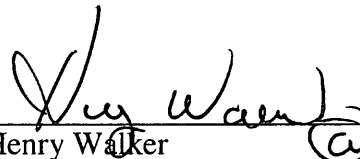
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